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Director - Federal Government Affairs

MAY 12 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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May 12, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street SW, Room TWB-204
Washington, D.C. 20554

RE: Notice of Ex Parte meeting
Second Application by BellSouth Telecommunications, Inc. and BellSouth
Long Distance, Inc. for Provisioning of In-Region, interLATA Service in
Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday May 5, 1999 Richard Rubin, David Kettell, Lynn Crofton, C. Michael Pfau, Rose Johnson (by telephone), David Eppsteiner (by telephone), Marsha Rule (by telephone), Jay Bradbury (by telephone), Michelle Bourianoff (by telephone) and myself, of AT&T, met with Jake Jennings, Andrea Kearney and Bill Agee of the Common Carrier Bureau's Policy and Program Planning Division to discuss the minimum requirements the Commission should look for when reviewing Independent Third Party Tests of Incumbent LEC Operational Support Systems. Attached is a copy of a presentation outline which was used during the meeting.

Two copies of this Notice are being submitted to the Secretary of the FCC.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Quinn, Jr.", with a stylized flourish at the end.

cc: J. Jennings
A. Kearney
W. Agee

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Minimum Requirements for Independent Third Party OSS Testing

Federal Communications Commission
May 5, 1999

5/5/1999



Why Independent Third Party OSS Testing?

- Independent "Neutral" Analysis
 - Stops the finger pointing
 - Ends the "paper" debate over what the numbers mean
- Tests for Commercial Readiness of Capabilities for All Foreseeable Entry Vehicles and Systems Functionalities
 - Encompasses all order types
 - End-to-end functionality
- Provides Commission With Independently Generated Factual Record

THIRD PARTY TESTING

- Principles
- Capacity and Functionalities to be Tested
- Final Analysis and Report

PRINCIPLES (Cont'd)

- The process for selecting the independent third-party consultant establishing the scope of work and selection of the third-party consultant(s) should occur in a public forum, under state Commission supervision with participation of the ILEC and interested CLECs.



PRINCIPLES

- The development, testing, and monitoring process must be tightly managed by that independent, technically skilled, third party.
- The independent third-party consultant(s) should prepare a detailed plan for a comprehensive test of the ILEC's OSS in advance of any testing (the "Test Plan").



PRINCIPLES (Cont'd)

- For system development the independent third-party consultant(s) should rely exclusively on ILEC specifications previously provided to CLECs (*i.e.*, no side bar explanations).

PRINCIPLES (Cont'd)

- End-to-end tests must be included.
- Customers must actually be put in service.
- Details and specific timing of test orders must not be disclosed to ILEC in advance.
- Volume and stress testing must be initiated without specific advance warning to ILEC.
- Test must include "normal" and "peak" commercial volumes.

PRINCIPLES (Cont'd)

- Before testing is initiated, the parties (ILECs, CLECs, Commission and consultant(s)) should reach written closure on the Test Plan.
- The Written Test Plan should include a clear definition of what constitutes success (e.g., the performance measures being used and the level of performance that is expected).
- The Written Test Plan should also define the actions to be taken if that level is not achieved

PRINCIPLES (Cont'd)

- The test scenarios must be specifically developed to reflect expected competitive market activities. That is, there must be a representative mix of:
 - service entry strategies (*e.g.*, UNE-L, UNE-P),
 - operational support functions (*e.g.*, pre-order, ordering, provisioning, maintenance, repair, billing, etc.), and
 - operational transactions (*e.g.*, migrate as is, new installs, etc.).
 - relationship management and infrastructure (*e.g.*, change management process/interface development, account management process, network design requests, collocation and interconnection planning procedures, help desk functions, CLEC training, etc.)



PRINCIPLES (Cont'd)

- The testing by the third-party consultant(s) should explicitly address two broad areas:
 - load carrying capacity, and
 - functional capability.

PRINCIPLES (Cont'd)

Load carrying capacity or stress testing should be pursued that would involve incrementally increasing transactional volumes until performance degrades or foreseeable market volumes are surpassed. Likewise, the test should be conducted to ascertain ability to deal with load peaks (*i.e.*, how well are load surges handled).



PRINCIPLES (Cont'd)

A functional capability test addresses actual service infrastructure support capabilities. This includes service delivery at predetermined volumes incorporating a representative mix of transaction types as would likely occur in the process of pre-ordering, ordering, provisioning, maintenance, and billing.

PRINCIPLES (Cont'd)

- Third-party testing requires the solid foundation of a *validated* performance measurement system. Absent such validation one cannot:
 - assume the results gathered are correct if the production systems are used without validation, nor
 - assume the results are representative if a "special method" is used for data collection.

PRINCIPLES (Cont'd)

- The performance measurement system must *validate* the following:
 - documentation
 - calculation
 - output (results)
 - data retention
 - compliance reporting

CAPACITY AND FUNCTIONALITIES TO BE TESTED

- Pre-Ordering
- Ordering and Provisioning
- Maintenance and Repair
- Billing
- Relationship Management and Infrastructure

Measurements have already been documented that focus upon each of these areas.

FINAL ANALYSIS AND REPORT

- The final test report (qualitative and quantitative analysis) must evaluate the:
 - quality of ILEC access to its OSS, and, through its OSS, to its legacy systems and processes
 - adequacy of performance measurement system
 - results of quantitative monitoring
 - exceptions identified and adequacy of corrective actions
 - load carrying capability
 - quality of supporting documentation
 - change control process
 - extent of flow through

FINAL ANALYSIS AND REPORT (Cont'd)

- The final test report (qualitative and quantitative analysis) must evaluate the:
(cont'd)
 - relative ease or complexity of creating each interface based upon the documentation provided by the ILEC to the CLEC.
 - timeliness and level of support provided through such mechanisms as help desks and hot lines.
 - the business-to-business aspects of attempting to enter the local market (relationship management and infrastructure)



FINAL ANALYSIS AND REPORT (Cont'd)

- All parties, including Commission staff, must have an opportunity to comment and/or take exception.
- Before the test could be considered "successfully completed," all identified operational deficiencies must be corrected and confirmed through re-testing until the critical flaw is resolved